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May 16, 2022

VIA ECF

The Honorable Katharine H. Parker
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. This joint agenda letter is submitted on behalf of all parties as directed in the Court's order of April 21, 2022 (Dkt. No. 213).

The parties hereby present the following agenda of items for discussion at the upcoming status conference of May 18, 2022:

1. Provide Update to Court Concerning Progress of Expert Discovery
2. Discuss Canal's Rule 30(b)(6) Testimony, Defendants' Responses to Interrogatories Nos. 8 and 9, and Production of Portions of Canal's General Ledger and Receipts
3. Provide Update to Court Concerning Potential Stipulations Among the Parties
4. Discuss Identification of Documents Supporting Defendants' Damages Calculation Pursuant to Rule 26(a)(1)(A)(iii)
5. Discuss Issues with Defendants' ESI Production, including Re-Production of Non-Compliant Documents and Non-Production of ESI from Mr. De Niro's "Flip Phone"
6. Provide Update to Court Concerning Discovery Sought by Defendants as to Plaintiff's Physical Injuries
7. Discuss Discovery Sought by Defendants as to Plaintiff's "Producer" Responsibilities

Respectfully submitted,

A handwritten signature in blue ink that reads "Alexandra Harwin". The signature is stylized with a large, looped "A" and a cross at the end of the last name.

Alexandra Harwin